

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

ALFRED JONES

:

Plaintiff :

v.

:

Case No.:

WASHINGTON METROPOLITAN
AREA TRANSIT AUTHORITY

:

and

:

OLTHEA WEST

:

Defendants :

INTERROGATORIES

TO: WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY, Defendant

BY: ALFRED JONES, Plaintiff

The following Interrogatories are propounded pursuant to the Maryland Rules of Procedure and are to be answered fully and under oath:

A. These Interrogatories are continuing in character so as to require you to file supplementary answers if you obtain further or different information before trial.

B. Where the name or identity of a person is requested, please state the full name, home address, and also business address if known, as well as the home and business phone number.

C. Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.

D. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys. When answer is made by a corporation or other legal entity, state the name, address and title of the person supplying the information, and making the affidavit, and the source of his information.

E. Said Interrogatories shall include the following definitions:

i. Any request to identify any record, documents or writing

shall include identification as to: (a) the date the same was dated or otherwise prepared; (b) the name, address and title of the person preparing same; (c) the name, address and title of the person for and to whom the same was prepared and addressed; (d) the name, address and title of all persons to whom copies of the same were furnished or otherwise forwarded; (e) the title and other identifying designation given the same; (f) the subject matter and content of the same; and (g) the name, address and location and title of the person having possession.

ii. The pronoun "you" refers to the party to whom these Interrogatories are addressed, its agents, servants, employees, representatives, officers or anyone acting for or on behalf of that party.

* * *

Interrogatory No. 1:

State the name and address of the person answering these Interrogatories, your title, your affiliation with the Defendant and the length of time with the Defendant in that position.

Interrogatory No. 2:

Name the eyewitnesses to all or part of the occurrence and state the location of each such eyewitness at the time of the occurrence.

Interrogatory No. 3:

Name all persons who were at or near the scene or arrived at the scene within two hours after the occurrence.

Interrogatory No. 4:

Name any person, not heretofore or hereinafter mentioned, having personal knowledge of facts material to this case.

Interrogatory No. 5:

If anyone investigated this matter for you, state their name(s) and

address(es), and state whether such investigation was reduced to writing. If said investigator obtained any signed statements or recorded statements, identify the person who gave the statement and attach to your Answers a copy of any said statement.

Interrogatory No. 6:

State whether you have within your possession or control photographs, plats or diagrams of the scene, video tapes, or objects connected with said occurrence or any social media material intended to be used at trial in any effort to diminish Plaintiff's recovery for damages; and if so, identify each such object, the date produced or obtained, and the present custodian thereof. Attach all such items to your Answers to Interrogatories.

Interrogatory No. 7:

State the manner in which you will say at trial how the accident complained of happened, giving the various speeds, positions, directions and locations of all vehicles involved in the said accident during their approach to, at the time of, and immediately following the happening, and in so doing, describe how the Party propounding these Interrogatories, or any other person or party, or its agent(s) or employee(s) was negligent or caused or contributed to the happening of the occurrence.

Interrogatory No. 8:

State whether you have within your possession or control, or have knowledge of, any transcripts of testimony, in any proceedings arising out of the occurrence. If so, state the date, the subject matter, the name and address of the person who has present possession of each said transcript of testimony.

Interrogatory No. 9:

Do you know of any statement, conversation, comment or report made by this Plaintiff at the time of the occurrence or following the occurrence, concerning the occurrence or facts relevant to any issue in this case? If you answer is "yes", state the content of such statement, conversation, comment or report, the place where it took place, and in whose presence it was made.

Interrogatory No. 10:

State the name and specialty of all experts whom you propose to call as witnesses at trial, and for each expert state the subject matter on which the expert is expected to testify, the substance of the findings and opinions to which the expert is expected to testify and attach to your Answers copies of all written reports of each such expert.

Interrogatory No. 11:

State which of the persons named in your Answers are known or related to you and the extent and character of the acquaintanceship or nature of the relationship.

Interrogatory No. 12:

State the name of any insurance company that might be liable to satisfy all or part of any judgment that might be entered against you in this case, and for each company named, state the limits of coverage. If you are self insured state whether there are any limits of coverage and cite any statutes or regulations which limit the amount of coverage.

Interrogatory No. 13:

At the scene of the accident, was the traffic controlled by signal lights, public officers or other means' and if so, state the nature of the controls and the location thereof in relation to the point of impact.

Interrogatory No. 14:

Set forth the name of the individual who owned the vehicle at the time of the incident that is a gravamen of this lawsuit, and set forth specifically any and all reasons why the person who was driving the said vehicle was behind the wheel, whether that person had permission of the owner, whether he was on an errand for the owner, and whether he was an agent of the owner, as well as all facts and circumstances upon which you rely.

Interrogatory No. 15:

State all damages and/or injuries alleged to have been suffered by the Plaintiff as a result of the occurrence complained of which you contended was caused, aggravated, or precipitated by any prior or any subsequent injury, disease, or sickness or any other condition. Specify in detail the nature and extent of the facts upon which you will rely to establish such causation, aggravation or precipitation.

Interrogatory No. 16:

Do you know of any statement, conversation, comment or report made by this Plaintiff at the time of the occurrence or following the occurrence, concerning the occurrence or facts relevant to any issue in this case? If you answer is "yes", state the

content of such statement, conversation, comment or report, the place where it took place, and in whose presence it was made.

Interrogatory No. 17:

State the parts of your vehicle damaged in the occurrence complained of, the name and address of the person who repaired it and the date and cost of the repairs. If your vehicle has not been repaired, state the days of the weeks, the time of the time and the places it may be seen.

Interrogatory No. 18:

State whether your driver consumed any alcoholic beverages, medications, drugs or products containing drugs within twelve (12) hours prior to the said occurrence, the places and times where such alcoholic beverages, medications, drugs or products were consumed, the exact nature of the alcoholic beverages, medications, drugs or products, and the amounts consumed, as well as the names and addresses of all persons present when you consumed them.

Interrogatory No. 19:

Did your driver plead guilty to any violation placed against her arising from the occurrence? If so, state the violation she was charged with, and where and when she pled guilty to same.

Interrogatory No. 20:

At the time of the accident, was there any obstruction to your driver's visibility? If so, explain fully.

Interrogatory No. 21:

After realizing that there might be a collision, what, if anything, was done by your driver in the operation of your vehicle in an attempt to avoid a collision?

Interrogatory No. 22:

Did your vehicle skid, and if so, set forth the total distance of the skid marks, the manner in which they were measured, and the individual who measured them.

Interrogatory No. 23:

Did your vehicle swerve either to the right or to the left immediately prior to the collision? If so, state the direction in which your vehicle swerved and the distance separating your vehicle and the vehicle first struck at the time of swerving. Also, state the distance of your vehicle from the Plaintiff's vehicle at this time.



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